



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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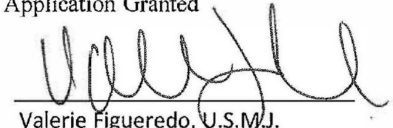
DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

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December 9, 2022

**BY ECF**

Hon. Valerie Figueredo  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Application Granted  
  
Valerie Figueredo, U.S.M.J.  
DATED: 12-12-2022

Re: *Civil Rights Corps, et al. v. Cushman, et al.*, 21-cv-9128 (VM) (VF)

Dear Magistrate Figueredo:

The Office of the Attorney General represents Defendants Andrea E. Bonina, and Hector D. LaSalle, Presiding Justice of the Supreme Court of the State of New York, Appellate Division, Second Department, in the above-referenced action. This letter is submitted on behalf of all parties in response to the Court's December 8, 2022 Order. Dkt. No. 138.

Settlement discussions between the parties continue in preparation for the January 19, 2023 settlement conference with the Court. *See* Dkt No. 135. The parties held a conference on December 5, 2022, during which they agreed as to the participants with settlement authority and discussed other substantive issues. Plaintiffs agreed to produce Patterson Belknap's records as to case timekeepers and the hours per timekeeper. They also agreed to produce records for the hours expended on this litigation by attorneys at Civil Rights Corps. The Second Department will produce other examples of its application of the standing policy to attorney grievance complaints. The parties have scheduled another conference for Tuesday, December 20, 2022.

As the Court has stayed case deadlines *sine die* pursuant to its November 21, 2022 order, *see* Dkt No. 135, the parties do not have any discovery-related issues that require the Court's attention. Accordingly, we respectfully request adjournment of the December 15, 2022 conference.

Sincerely,

/s/ Joya C. Sonnenfeldt

Joya C. Sonnenfeldt  
Assistant Attorney General